

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

JOEL OSMIL LOZADA ARROYO

XXX-XX-4349

Debtor

**Case No: 09-08516(ESL)**

Chapter 13

**RESPONSE TO DEBTOR'S REPLY TO TRUSTEE'S MOTION REQUESTING ENTRY  
OF ORDER (DOCKET NO. 72)  
TO THE HONORABLE COURT:**

**NOW COMES** José R. Carrión, Standing Chapter 13 Trustee (hereinafter, the "Trustee") through the undersigned counsel, and very respectfully states and requests:

1. On June 23, 2011, the Trustee filed a motion requesting entry order directing Debtor to submit the Final Agreement reached with Banco Popular de Puerto Rico ("Banco Popular") and to amend the Schedule J reflecting the new mortgage payments (the "Motion"). (Docket No. 70).

2. On June 29, 2011, Debtor filed a reply to the Trustee's Motion informing the filing of an amended Schedule J. (Docket No. 72)

3. The Trustee hereby informs this Honorable Court that Debtors has not submitted copy of the Final Agreement reached with Banco Popular. Therefore, Debtor must submit copy of such Agreement in order to review the terms of the Agreement and the new mortgage payment. This information will corroborate if

Debtor is submitting all his disposable income to fund the Post Confirmation Plan Modification pursuant to 11 U.S.C. §1329.

**WHEREFORE,** the Trustee respectfully requests this Honorable Court that this motion be granted and order Debtor to submit to Trustee the Final Agreement with Banco Popular.

**CERTIFICATE OF SERVICE:** The Chapter 13 Trustee certifies that today, this document has been filed using the Court's CM/ECF System, which will provide electronic notice of the same to all appearing parties that are CM/ECF participants and that copy of this motion has been served by regular U.S. Mail on this same date to: the DEBTOR(s) by first class mail to the address of record.

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of September, 2011.

**/S/ Mayra M. Argüelles-Álvarez**

Staff Attorney  
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CHAPTER 13 TRUSTEE  
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The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail to the parties listed below:

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DATED: September 02, 2011

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Nilda Muniz

OFFICE OF THE CHAPTER 13 TRUSTEE